

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
YOON SIK MOON,

Plaintiff,

-against-

EMILIANO MARTINEZ BECCO and LIONETTI  
ASSOCIATES, LLC,

Defendants.

Index No.:

**SUMMONS**

Plaintiff designates Queens  
County as the place of trial.

The basis of venue is:  
Place of occurrence

County of QUEENS

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To the above named Defendant(s)

You are hereby summoned to answer the complaint in this action, and to serve a copy of your answer, or if the complaint is not served with this summons, to serve a notice of appearance on the Plaintiff's attorney(s) within twenty days after the services of this summons exclusive of the day of service, where service is made by delivery upon you personally within the state, or within 30 days after completion of service where service is made in any other manner. In case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the complaint.

Dated: Garden City, New York  
September 22, 2022

Yours, etc.

By: JOSEPH G. DELL, ESQ.  
DELL & DEAN, PLLC.

*Attorneys for the Plaintiff*  
*YOON SIK MOON*

1225 Franklin Avenue - Suite 450  
Garden City, New York 11530  
(516) 880-9700  
File No. 5709

TO: EMILIANO MARTINEZ BECCO – *Via VTL 253*  
351 W. Clay Avenue  
Roselle Park, New Jersey 07204

LIONETTI ASSOCIATES, LLC  
450 South Front Street  
Elizabeth, New Jersey 07202

\*\*\*\*\* Please submit these papers to your insurance carrier \*\*\*\*\*

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
YOON SIK MOON,

**VERIFIED COMPLAINT**

Plaintiff,

Index No.:

-against-

EMILIANO MARTINEZ BECCO and LIONETTI  
ASSOCIATES, LLC,

Defendants.

-----X

Plaintiff **YOON SIK MOON** by his attorneys, DELL & DEAN, PLLC., as and for his Complaint alleges against the Defendants, **EMILIANO MARTINEZ BECCO and LIONETTI ASSOCIATES, LLC** upon information and belief as follows:

**THE PARTIES**

1. At all times herein mentioned, Plaintiff, **YOON SIK MOON**, was, and still is a resident of the County of Queens, State of New York.
2. At all times herein mentioned, and upon information and belief, Defendant **EMILIANO MARTINEZ BECCO** was and still is a resident of the State of New Jersey.
3. At all times herein mentioned, Defendant, **LIONETTI ASSOCIATES, LLC** was, and still is, a limited liability company or other legally formed entity duly organized and existing under and by virtue of the laws, charters, and statutes of the State of New Jersey and doing business within the State of New York.
4. That at all times hereinafter mentioned, Defendant **LIONETTI ASSOCIATES, LLC** maintained a principal place of business at 450 South Front Street, Elizabeth, New Jersey.
5. This action falls within one or more of the exceptions set forth in CPLR 1602.

**AS AND FOR A FIRST CAUSE OF ACTION  
ON BEHALF OF PLAINTIFF**

6. Plaintiff, **YOON SIK MOON** respectfully repeats, reiterates and realleges each and every paragraph numbered "1" through "5", inclusive, with the same force and effect as if said paragraphs were more fully set forth at length herein.

7. At all times herein mentioned, Plaintiff **YOON SIK MOON** was the owner and operator of a 2010 Toyota motor vehicle bearing New York State license plate number DJA4454.

8. At all times herein mentioned, Defendant **LIONETTI ASSOCIATES, LLC** was the owner of a 2013 Kenworth motor vehicle bearing New Jersey State license plate number AU128N.

9. At all times herein mentioned, Defendant **EMILIANO MARTINEZ BECCO** operated the 2013 Kenworth motor vehicle bearing New Jersey State license plate number AU128N with the knowledge, consent and permission of Defendant **LIONETTI ASSOCIATES, LLC**

10. At all times herein mentioned, Defendant **EMILIANO MARTINEZ BECCO** maintained the aforementioned motor vehicle.

11. At all times herein mentioned, Defendant **LIONETTI ASSOCIATES, LLC** maintained the aforementioned motor vehicle.

12. At all times herein mentioned, Defendant **EMILIANO MARTINEZ BECCO** controlled the aforementioned motor vehicle.

13. At all times herein mentioned, Defendant **LIONETTI ASSOCIATES, LLC** controlled the aforementioned motor vehicle.

14. At all times herein mentioned, Defendant **LIONETTI ASSOCIATES, LLC** negligently entrusted the aforementioned motor vehicle to Defendant **EMILIANO MARTINEZ**

BECCO.

15. At all times herein mentioned, Defendant **LIONETTI ASSOCIATES, LLC** knew or should have known that Defendant **EMILIANO MARTINEZ BECCO** was incompetent to operate said vehicle.

16. At all times herein mentioned, Defendant **EMILIANO MARTINEZ BECCO** breached a duty of care owed to the Plaintiff **YOON SIK MOON** in that he failed to drive as a reasonably prudent person under the circumstances existing on August 31, 2022.

17. At all times herein mentioned, the location of 204 Street at or near its intersection with Northern Boulevard, in the County of Queens, State of New York, was and still is a public roadway over and along which motor vehicles were accustomed to and did travel.

18. On August 31, 2022, at approximately 1:45 p.m., Defendant **EMILIANO MARTINEZ BECCO** was operating the aforementioned 2013 Kenworth motor vehicle owned by Defendant **LIONETTI ASSOCIATES, LLC** bearing New Jersey State license plate number AU128N at the aforementioned location.

19. On August 31, 2022, at approximately 1:45 p.m., the Plaintiff **YOON SIK MOON** was operating his 2010 Toyota motor vehicle bearing New York State license plate number DJA4454 at the aforementioned location.

20. On August 31, 2022, at approximately 1:45 p.m., at the aforementioned location, the motor vehicle owned by Defendant **LIONETTI ASSOCIATES, LLC** and operated by Defendant **EMILIANO MARTINEZ BECCO** struck and/or came into contact with the motor vehicle owned and operated by the Plaintiff, **YOON SIK MOON**.

21. As a result of the aforesaid contact, Plaintiff, **YOON SIK MOON** sustained severe and serious injuries as defined in Section 5102(d) of the Insurance Law of the State of New York and economic loss greater than basic economic loss as defined in Section 5102(a) of the Insurance Law of the State of New York.

22. The aforesaid contact and serious injuries sustained by the Plaintiff was caused solely by the negligence, carelessness, recklessness, reckless disregard and gross negligence of the Defendants, in their ownership, operation, maintenance and control of their motor vehicle.

23. By reason of the foregoing, Plaintiff, **YOON SIK MOON** has been damaged in a sum that exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction over this matter.

**WHEREFORE**, it is respectfully requested that this Court grant judgment against the Defendants on the First and Second Causes of Action in an amount which exceeds the jurisdictional limit of all lower courts which might otherwise have jurisdiction over this matter, together with costs and disbursements, and interest; and grant such other, further and different relief as to this Court may deem just and proper.

Dated: Garden City, New York  
September 22, 2022

Yours, etc.

By: JOSEPH G. DELL, ESQ  
DELL & DEAN, PLLC.  
*Attorneys for the Plaintiff*  
**YOON SIK MOON**  
1225 Franklin Avenue - Suite 450  
Garden City, New York 11530  
(516) 880-9700

## VERIFICATION

STATE OF *New York* )  
                          ) ss.:  
COUNTY OF *Nassau* )

I, Yoon Sik Moon being duly sworn, deposes and says:

I am the plaintiff in the within action;

I have read the following Summons + Complaint and believe the same to be true to my knowledge; the same is true to my knowledge except as to those matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

X Yoon-Sik Moon

Sworn to before me this  
12<sup>th</sup> day of Sept. 2022

Donna M. Parent

Notary Public

DONNA M. PARENT  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01PA5008225  
Qualified in Suffolk County  
My Commission Expires 02-16-2023

Index No:

**SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS**

---

YOON SIK MOON,

Plaintiff,

- against -

EMILIANO MARTINEZ BECCO and LIONETTI ASSOCIATES, LLC,

Defendants.

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**SUMMONS AND VERIFIED COMPLAINT**

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**DELL & DEAN, PLLC**

*Attorneys for Plaintiff*

1225 Franklin Avenue, Suite 450

Garden City, New York 11530

(516) 880-9700

*Pursuant to 22 NYCRR 130-1.1-a, the undersigned, an attorney admitted to practice in the courts of New York State, certifies that, upon information and belief and reasonable inquiry, (1) the contentions contained in the annexed document are not frivolous and that (2) if the annexed document is an initiating pleading, (i) the matter was not obtained through illegal conduct, or that if it was, the attorney or other persons responsible for the illegal conduct are not participating in the matter or sharing in any fee earned therefrom and that (ii) if the matter involves potential claims for personal injury or wrongful death, the matter was not obtained in violation of 22 NYCRR 1200.41-A.*

Dated: September 22, 2022

Signature.....  
Print : Joseph G. Dell

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**PLEASE TAKE NOTICE**

**NOTICE OF** That the within is a (certified) true copy of an  
Entered in the office of the clerk of the within-named Court on  
Entry

**NOTICE OF** That an Order of which is a true copy will be presented for settlement to the  
Hon. , one of the judges of the  
within-named Court,  
**SETTLEMENT** at

on 20 , at

M.

Dated:

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**DELL & DEAN, PLLC**  
*Attorneys for Plaintiff*  
1225 Franklin Avenue, Suite 450  
Garden City, New York 11530  
(516) 880-9700